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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAGINI VECHAM et al.,

Defendants.

Case No. CR. 15-00427 BLF

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE STATUS  
CONFERENCE FROM NOVEMBER 3,  
2015 TO DECEMBER 8, 2015**

**STIPULATION AND [PROPOSED] ORDER**

The United States of America, by and through Assistant United States Timothy Lucey, Ragini Vecham, by and through her counsel Nanci Clarence, Kishore Pallapothu, by and through his counsel of record Mary McNamara, Satyanarayana Tota, by and through his counsel of record Ethan Balogh, and Ramana Reddy, by and through his counsel of record Ismail Ramsay, together respectfully request that the Court continue the status conference currently set for November 3, 2015 to December 8, 2015 at 9:00 a.m., for the following reasons:

1           1.       The United States recently produced to defense counsel an external hard drive  
2 containing a large amount of documents and data representing the discovery in this case;

3           2.       Defense counsel is reviewing and will be continuing to review and evaluate  
4 discovery already provided by the Government in this matter relative to preparing for the status  
5 hearing and setting further dates before the Court. Defense counsel, therefore, desire additional  
6 time to review the discovery and current charges, consult with their clients, conduct research and  
7 investigation, and otherwise prepare and evaluate the case.  
8

9           3.       In light of the foregoing, counsel for the parties jointly agree and stipulate that a  
10 continuance of this matter is appropriate and that based on their respective calendars and the  
11 period needed to evaluate the aforementioned discovery matters, an appropriate date for a status  
12 hearing is December 8, 2015.  
13

14          4.       The parties, therefore, jointly request that the Court issue an order continuing the  
15 status conference from November 3, 2015 to December 8, 2015.

16          5.       The parties further agree that excluding time until December 8, 2015 is  
17 appropriate in order to provide reasonable time necessary for effective preparation of counsel,  
18 taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(7). Finally, the  
19 parties agree that the ends of justice served by excluding time from November 3, 2015, up to and  
20 including until December 8, 2015, outweigh the best interest of the public and the defendant in a  
21 speedy.  
22

23                   **IT IS SO STIPULATED**  
24

25                                   Respectfully submitted,

26                   Dated: October 30, 2015

27                                   /s/ \_\_\_\_\_  
28                                   TIMOTHY J. LUCEY  
   Assistant United States Attorney

1 Dated: October 30, 2015

/s/\_\_\_\_\_  
EDWIN PRATHER/MARY McNAMARA  
Attorney for Kishore Pallapothu

4 Dated: October 30, 2015

/s/\_\_\_\_\_  
NANCI CLARENCE  
Attorney for Ragini Vecham

7 Dated: October 30, 2015

/s/\_\_\_\_\_  
ISMAIL RAMSEY  
Attorney for Ramana Reddy

10 Dated: October 30, 2015

/s/\_\_\_\_\_  
ETHAN A. BALOGH  
Attorney for Satyanarayana Tota

13 **IT IS SO ORDERED.**

15 DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. BETH L. FREEMAN  
United States District Court